Cap-and-Trade: Lessons from Other Programs

Helping States and the Nation Tackle Climate Change



WA Webinar Series

Webinar #1: Introduction to Market Mechanisms

Webinar #2: Key Lessons from Other Programs

(US Acid Rain Program; European Union Emissions Trading Scheme, Northeast Regional Greenhouse Gas Initiative, Cal Market Advisory Committee, & Oregon Load-based electricity

cap)

Webinar #3: What Issues Arise for Washington and

for the Western Region in Designing a

Program?

Webinar #4: A Chance to Hear from Washington Groups?



Agenda

- U.S. Acid Rain SO₂ & NOx Budget Programs
 Brian McLean, Director, EPA Office of Atmospheric Programs
- <u>European Union Emissions Trading Scheme (ETS)</u>
 Jill Duggan, Head of International Emissions Trading,
 U.K. Dept. for Environment, Food & Rural Affairs (DEFRA)
- Northeast Regional Greenhouse Gas Initiative (RGGI)
 Franz Litz, former Chair of RGGI States' Working Group
- Oregon Load-based Design
 Phil Carver, Oregon Department of Energy
- CA Market Advisory Committee (MAC) Design
 Franz Litz, Cal MAC Committee Member
- Sneak Peak at Next Webinar

Experience with Acid Rain and NOx Cap-and-Trade Programs

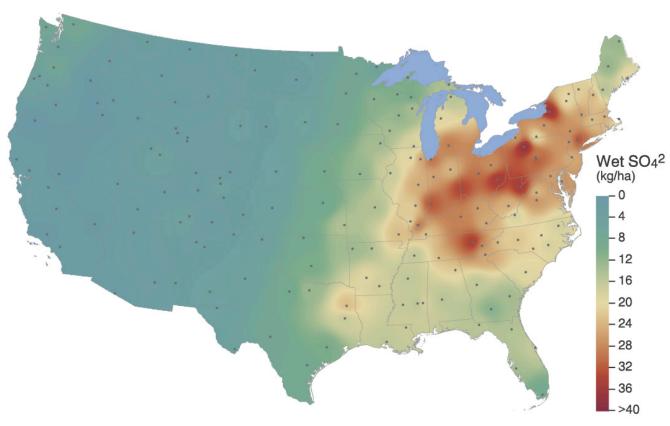
Brian McLean, Director
Office of Atmospheric Programs,
U.S. Environmental Protection Agency
July 23, 2007

Overview

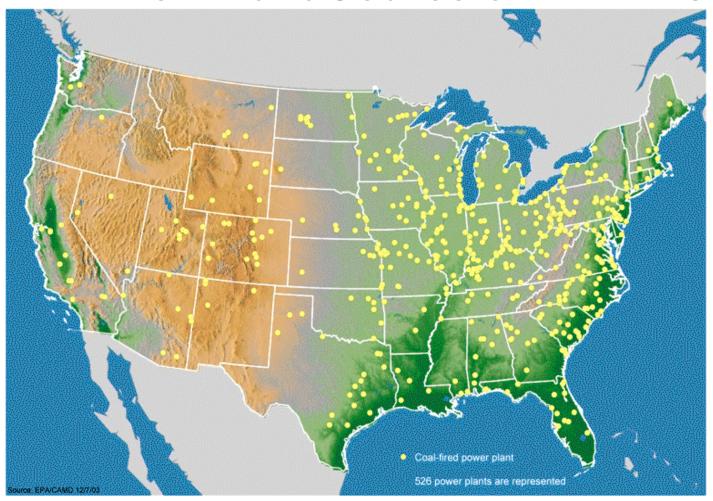
- Cap and trade is one of several regulatory approaches
- If properly designed and applied, it can be
 - Environmentally effective and administratively efficient
 - Reduce emissions quickly and cost-effectively
 - Promote innovation
- Works best in situations where
 - Aggregate impact is principal concern
 - Costs differ across a range of options
 - Strong regulatory institutions and financial markets exist
- Can work in concert with other regulatory approaches

Addressing Acid Rain

Annual Mean Wet Sulfate Deposition, 1989-1991



Coal-Fired Power Plants Are the Dominant Source of Air Emissions



U.S. Coal-Fired Power Plants

- There are about 530 power plants with 305 GW of capacity that consists of about 1,300 units.
- Coal plants generate the vast majority of power sector emissions:
 - -95% SO₂
 - -90% of NO_x
 - -83% of CO₂

Setting the Cap and Allocating Allowances: Acid Rain Program

- Legislation established
 - cap level
 - timing of reductions
 - allocations
- Allocation was not addressed until the cap was agreed upon
- Requests for additional allowances had to be balanced against losses of allowances

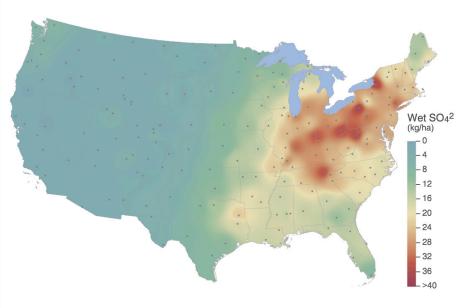
Distributing Allowances

- Considerations: Equity, environmental incentives, efficiency
- Recognition that vast majority of allocation approaches that EPA has considered all lead to the same level and distribution of emission reductions: the emission caps and banking drive reductions.
- Many ways, none are perfect:
 - Auction
 - Direct allocation to sources based on historical and/or current emissions, energy use (input), or production (output, e.g. MWH)
 - Set asides (new sources, renewables, demand side efficiency)
 - Hybrid
- Allowance allocation should balance need for certainty and allow for changing circumstances
 - EPA programs have allocations for several years into the future

Acid Rain Program Progress

Annual Mean Wet Sulfate Deposition, 1989-1991

Annual Mean Wet Sulfate Deposition, 2003-2005

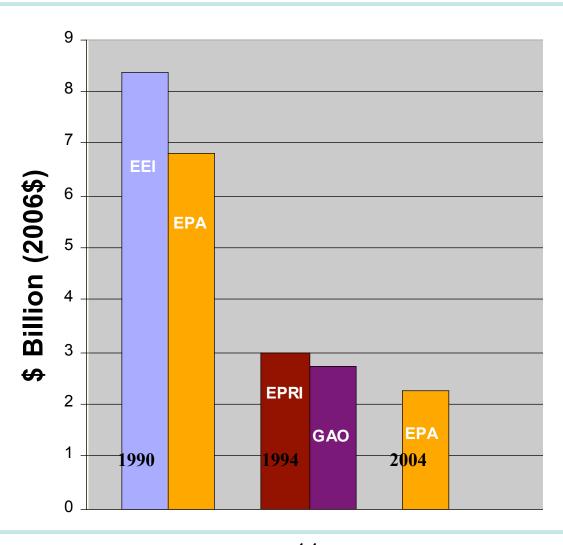




Source: National Atmospheric Deposition Program

Source: National Atmospheric Deposition Program

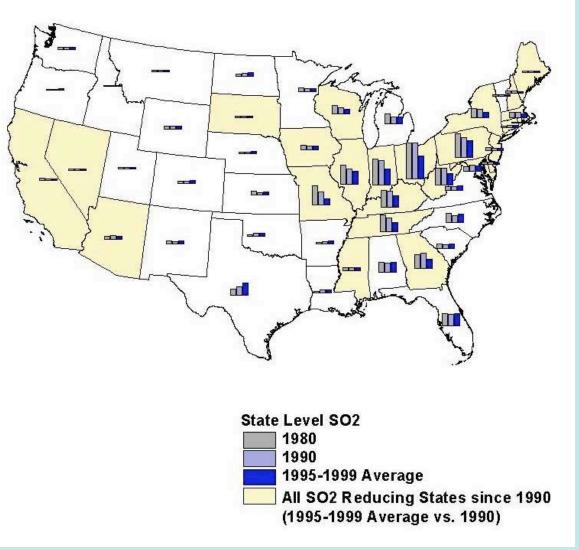
Acid Rain SO₂ Program Costs: Much Lower than Originally Predicted



Source: EPA, 2006

Spatial Issues (hotspots)

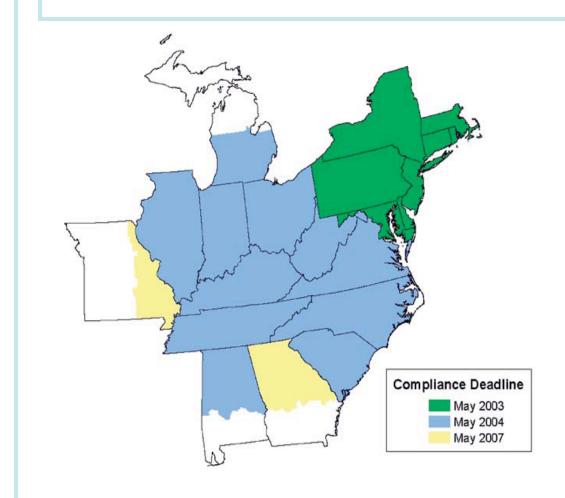
- Greatest reductions in States with highest emissions
- Independent analyses (i.e., ELI, RFF, and EDF) have found that trading under the Acid Rain Program has not created hot spots
- States and localities have authority to address local air quality problems (including setting facility permit levels that would preclude use of allowances)



NOx Trading Budget Trading Program: Addressing Ozone Transport

- Caused by local + transported emissions of NOx and VOC
- More diverse set of sources than acid rain
 - Power generation about 25% of NOx
- Seasonal problem with short term peak concentrations rather than total loadings

NOx Budget Trading Program (NBP)



- Problem: Reduce summer ozone/smog levels
- Scope: Eastern U.S.
- Target: Reduce NOx emissions from electric generators and industrial boilers by 1 million tons (70% below 1990 levels)
- Coverage: 2,570

units

NOx Budget Program Design Elements

- Timing:
 - Five-month compliance period: May 1 –September 30 ozone season
 - Finalized in 1998, monitoring required in 2002 and reductions in 2003
 - Court order moved compliance date for all states back to 2004
- Applicability
 - Fossil fuel fired electric generators > 25 MW
 - Industrial boilers and turbines >250 mmBtu/hr
- Allowance Distribution
 - Allocations from state, who have discretion
 - Allocations must be within state trading budget
 - States may also set aside a portion of the budget (Renewables, new sources)
- Allowance Use
 - Allowance is defined as authorization to emit one ton of NOx during ozone season
 - Unrestricted trading can occur between sources
 - Progressive Flow Control if necessary
 - Requires portion of banked allowances to be surrendered 2:1 if needed to cover emissions

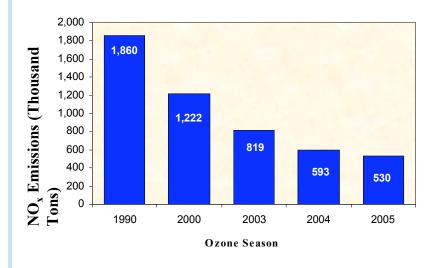
NOx Budget Program Design Elements

- Monitoring and Reporting Emissions
 - Sources required to continuously monitor emissions in accordance with Part 75–Updated Acid Rain Program monitoringregs
 - Additional guidelines:—Monitoring certification process—Data review—Quality assurance tests—Quarterly reporting
- Compliance and Enforcement
 - All sources must hold allowances sufficient to cover emissions
 - Compliance and overdraft accounts
 - Automatic excess emissions offset
 - 3 allowances for each ton of excess emissions
 - Other enforcement action possible

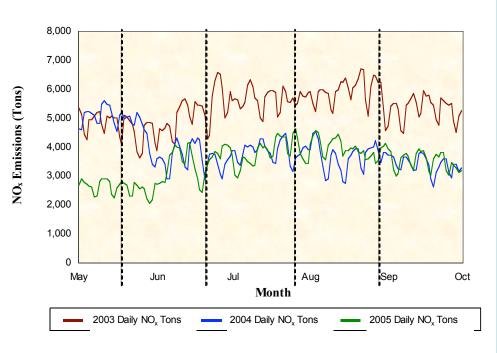
Summertime NOx Emission Reductions

2005 NBP states' ozone season reductions (May 1 – September 30)

- > 72% from 1990 baseline
- > 57% from 2000 baseline
- > 11% from 2004



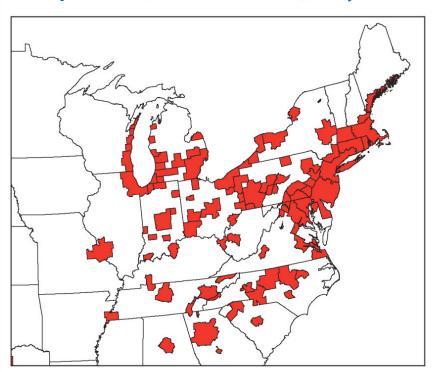
Daily Emission Trends for NOx Budget Trading Program Units in 2003, 2004 and 2005



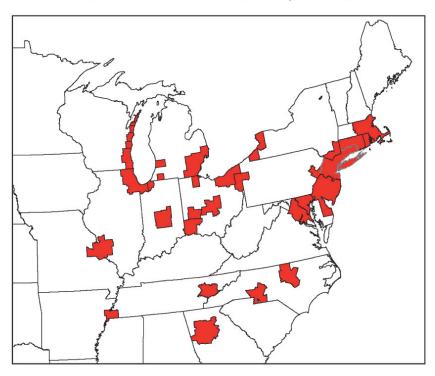
Source: EPA, 2006

70 % of Areas in the Eastern US that Didn't Meet the Ozone Std in 2004 Now Have Better Air than the Std Requires

8-Hour Ozone Nonattainment Areas, April 2004 (2001–2003 Air Quality Data)

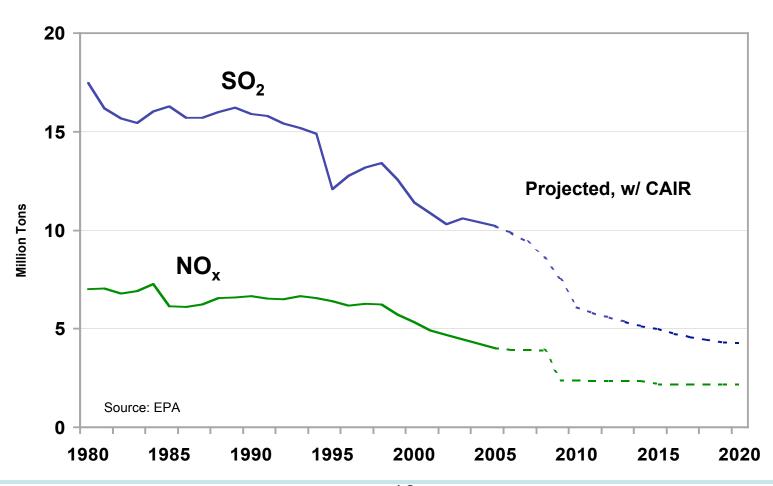


Areas Remaining Above Standard (2003–2005 Air Quality Data)



Note: Included on the maps, but excluded from the analysis, are four areas with incomplete data for 2003 to 2005 (Cass Co, MI; Dayton-Springfield, OH; Essex Co (Whiteface Mtn), NY; La Porte, IN).

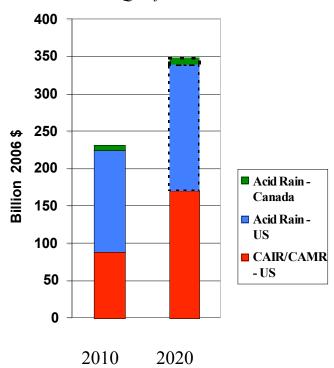
National SO2 and NOx Power Plant Emissions



Benefits of Acid Rain and CAIR Program

Annual Benefits

-Qualified Assessment-



Note: All estimates used a 3% discount rate. Use of 7% discount rate would lower estimates about 15 percent. CPI-U used to convert 1999\$ and 2000\$ to 2006\$. Sources: Used Chestnut & Mills Analysis, "A fresh look at the benefits and costs of the US acid rain program" (Oct. 1, 2004) for 2010 Acid Rain Benefits and EPA's Multi-pollutant Regulatory Analysis: CAIR, CAVR, CAMR (Oct. 2005) for 2010 and 2020 estimates for these programs. Acid Rain 2020 benefits extrapolated from 2010 estimates.

- Benefits driven by:
 - Reduced premature deaths
 - Lowering aggravation and incidence of heart and lung ailments
- Other benefits:
 - increased worker productivity
 - reduced absences from school and work
 - visibility improvement in some parks
- Benefits not included:
 - CAIR's Canadian Health Benefits
 - Acid rain environmental benefits
 - Mercury benefits
 - Remaining visibility benefits from parks and urban areas
 - Others

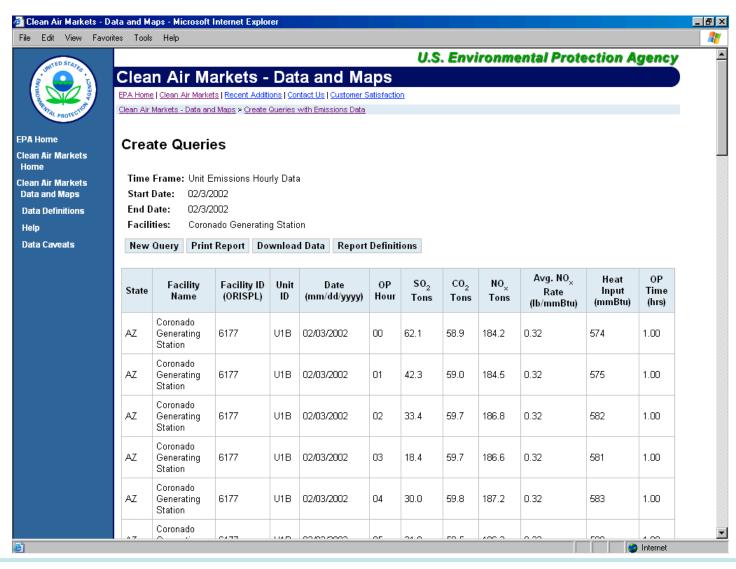
Basic Elements of Cap and Trade

- Full sector coverage All sources (existing and new) included
 - Minimizes shifting of production and emissions ("leakage")
 - Assures achievement of emission reduction goal without case-by-case review
 - Reduces administrative costs to government and industry
- Cap on emissions Government issuance of a fixed quantity of allowances
 - Limits emissions to achieve and maintain environmental goal
 - Limits creation of "paper credits" and "anyway tons"
 - Provides certainty to allowance market
- Monitoring Accurate measurement and reporting of all emissions
 - Assures accountability and results
 - Establishes integrity of allowances and confidence in the market
- Trading Unrestricted trading and banking (with source-specific limits allowed to protect local air quality
 - Allows companies to choose (and change) compliance options
 - Minimizes compliance cost
 - Ensures that trading will not cause "hotspots"

Emissions Measurement Goals

- Complete accounting with no underestimation
- Simplicity, consistency and transparency
- Incentives for accuracy and improvement
- Cost effectiveness
- Flexibility for small sources
 - 36% of units must use Continuous Emissions Monitors (CEMS)
 - Accounts for 96% of total SO2 emissions
- Electronic reporting, feedback, and auditing
- Public access to data

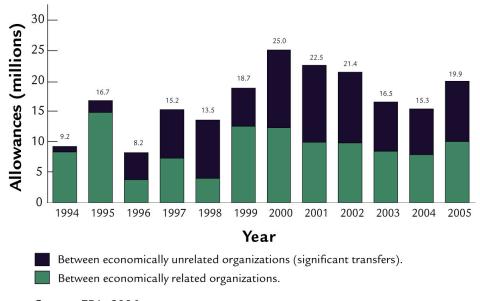
Public Access to Hourly Emissions Data



Active Allowance Market

- Over 222 million allowances transferred and over 43 thousand transactions since 1994
- Approximately 45% of transfers are arms length trades
- Over 98% of transfers are handled online
- Low transaction costs

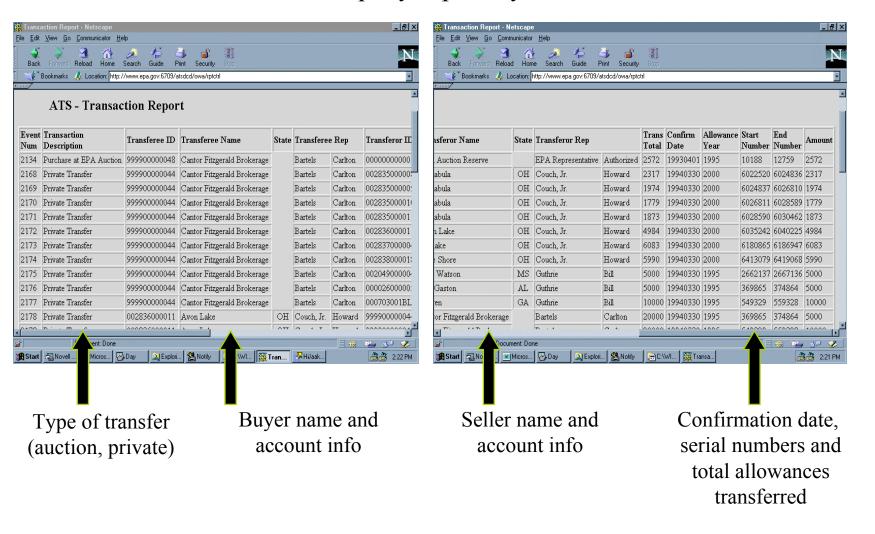
SO₂ Allowances Transferred under the Acid Rain Program



Source: EPA, 2006

Public Access to Allowance Data

Internet query capability



Lesson: Government Focus

- Achieving the environmental goal
 - Reducing and capping emissions
 - Greater than 99% compliance
- Supporting the allowance market by
 - Ensuring the integrity of the allowance, i.e., the authorization to emit
 - Minimizing administrative costs

For more information about OAP

 Office of Atmospheric Programs: <u>http://epa.gov/air/oap.html</u>

Clean Air Markets Division:

http://epa.gov/airmarkets/

 Climate Change Division: <u>http://www.epa.gov/air/ccd.html</u>

 Climate Protection Partnership Division: http://epa.gov/cppd/

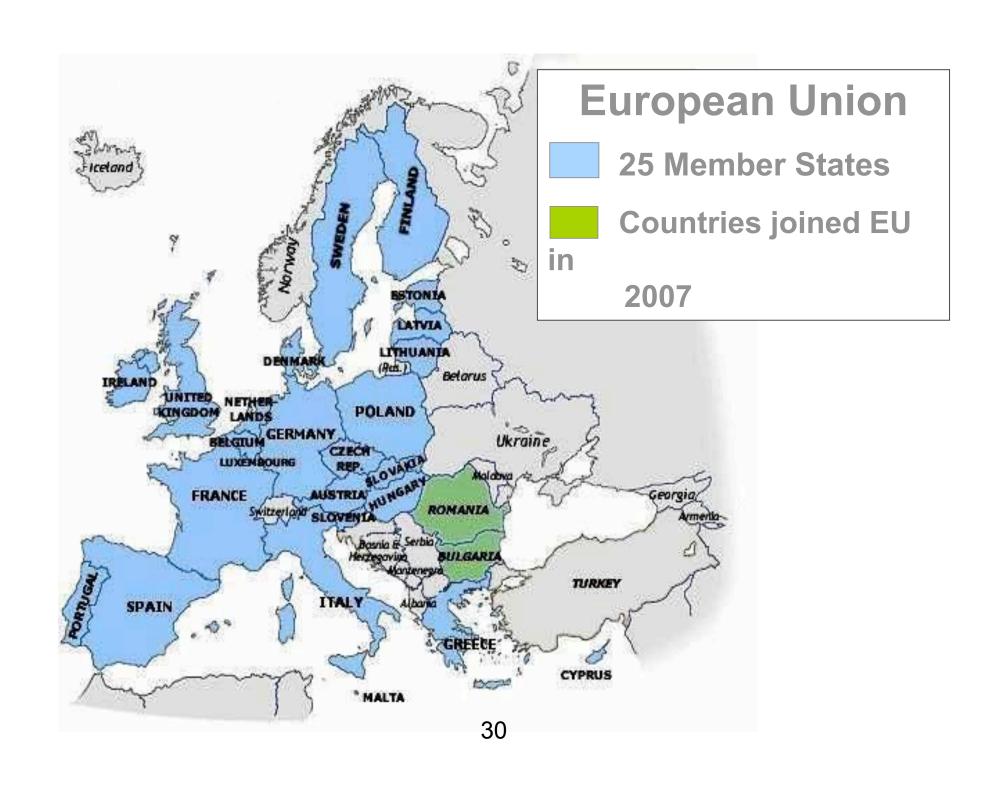
 Stratospheric Protection Division: http://www.epa.gov/ozone/

EU Emissions Trading: The UK's experience



Jill Duggan
Head of International Emissions Trading
Climate and Energy; Business and Transport
UK Department of Environment, Food & Rural Affairs (DEFRA)

European Union Emissions Trading Scheme



Key features of EU ETS

- <u>"Cap and trade"</u> scheme covering energy intensive industries
- <u>Direct emissions approach</u> liability placed on the entity responsible for emissions and therefore most able to take action
- Currency is <u>European Union Allowances (EUA)</u>
 - One EUA = one metric tonne of CO₂
- Allowances freely tradable throughout EU states

EU ETS Timeline

2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	
EU E	EU ETS PHASE 1			EU ETS PHASE 2					EU ETS PHASE 3?				EU ETS PHASE 4?			
			1st KY	1st KYOTO COMMITMENT PERIOD					KYOTO PROTOCOL POST-2012 FRAMEWORK?							

January 2005 - EU ETS commences

- Phase 1 EU ETS— 2005-2007 'learning phase'
- Phase 2 EU ETS

 2008-2012 'Kyoto Commitment Period'
- Phase 3 and beyond....

Sector Coverage

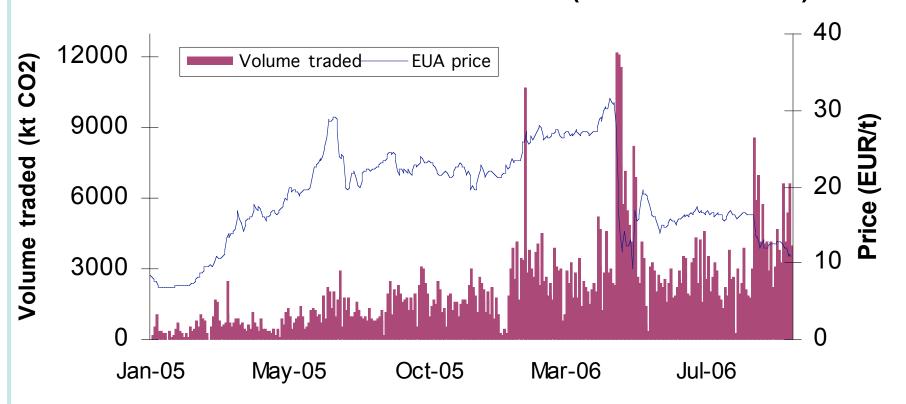
- Covers <u>CO₂ emissions</u> from combustion processes (approximately 50% of EU CO₂ emissions, 30% of EU greenhouse emissions)
- Covers approx 12,000 installations across the EU from these sectors:
 - Electricity generators
 - Other combustion installations (heat & steam production)
 - Mineral oil refineries
 - Iron and steel production and processing
 - Cement & lime
 - Glass & ceramics
 - Pulp & paper sector

Allocation of Allowances

- National Allocation Plan (NAP) sets out the total number of allowances to be issued and distributed to national installations
- Member States may auction up to 5% of allowances for Phase I, up to 10% for Phase II
- Majority of <u>allowances allocated for free</u>
 - Member States used a range of methods for allocation including historical emissions, projected emissions, sector benchmarks etc

EU ETS Allowance Price

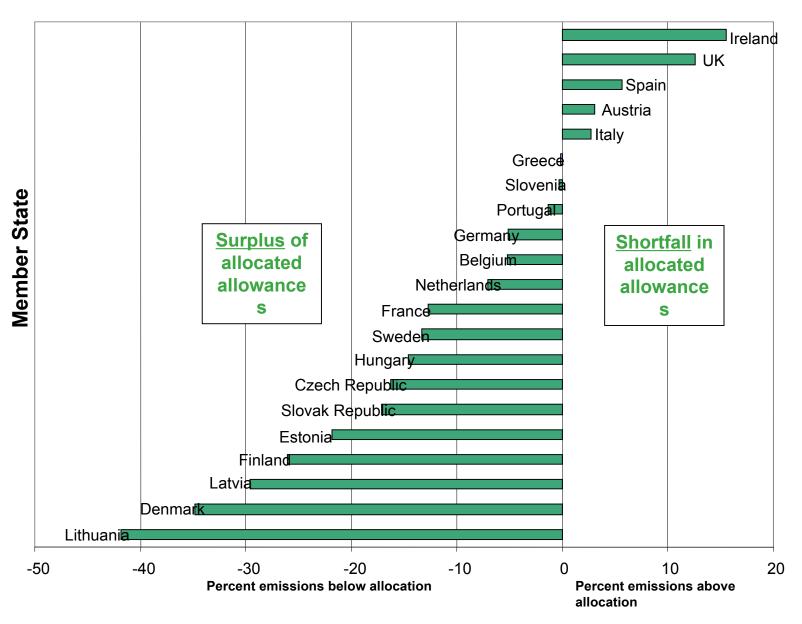
Carbon Market Price Indicator (Jan 05 - Nov 06)



Key short term drivers of carbon price

- Relative fuel prices (natural gas vs coal)
- Weather
 - Drought reduces hydro-electricity production
 - Unusually hot/cold weather increases energy demand
- Policy and regulatory issues
 - Announcement of National Allocation Plans
 - First year compliance results (indicates market long/short)
- Future trades

% difference between Member State allocations and emissions in 2005



Impact of EU ETS to date

- Very high compliance in first 2 years
- Improved emissions data across Europe
- Internalising cost of carbon in price of electricity generation
- Driving investment in Kyoto project credits (CDM)
- Behavioural change mainstreaming?

"Carbon dioxide has moved out of the domain of the environmental officer at a company to the boardroom and the chief financial officer and the chief executive officer"

Head of Director General Environment, European Commission

Future of the EU ETS

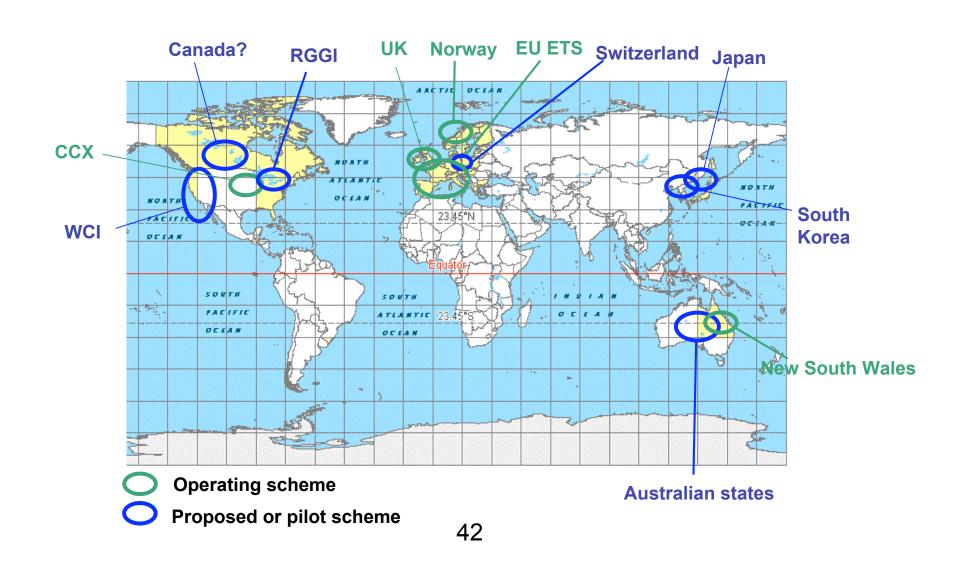
- Phase II begins 1 January 2008
- Expanding the scheme to additional gases or sectors
 - Aviation
- Increasing use of auctioning and benchmarking in allocation of allowances
- Review of ETS Directive this year centralisation of cap setting – more auctioning, more flexibility on linking....

Summary

- Emissions trading potentially effective in reducing emissions and will form core of UK and EU climate change policy into the future
- Allocation methodologies need to recognise that businesses have better information than public officials on their emissions reduction potential - and emissions reductions often easier to achieve than anticipated by either
- Impacts on market of including non-CO2 greenhouse gases need to be carefully considered

International emissions trading scheme

Domestic Emissions Trading Schemes being proposed or piloted...



For further information

Email:

• jill.duggan@defra.gsi.gov.uk

Website

 www.defra.gov.uk/environment/climatechange/tradin g/eu/index.htm

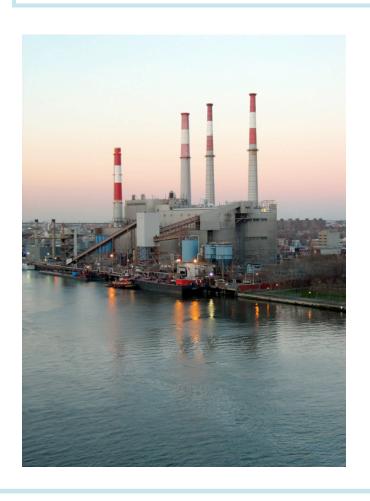


The Northeast Regional Greenhouse Gas Initiative (RGGI): A Cap-and-Trade for Power Plants in the Northeast

Franz T. Litz, Senior Associate Helping States and the Nation Tackle Climate Change



Regional Greenhouse Gas Initiative



The First Mandatory
Carbon Cap-and-Trade
Program in the U.S.

Launch Date: Jan. 1, 2009





Regional Greenhouse Gas Initiative

An Initiative of the Northeast & Mid-Atlantic States of the U.S.

The Region

- 10 States--bipartisan group of governors
- 48.8 million people— (16% of US Population)
- 10% of U.S. Emissions
- 8th largest emitter in the world
- \$2.4 trillion economy (19% of U.S.)



The Design Effort

- Fall 2003 Action Plan, with Design Principles
- Groundwork:
 - Learning
 - Data Gathering
 - Stakeholder Input
 - Modeling Analyses
- Making Program Design Decisions
 - Memorandum of Understanding December 2005
 - Model Rule August 2006
- Implementation -- Legislation & Rulemaking Ongoing
- Program Launch January 2009



BUILDING BLOCKS OF REGIONAL GREENHOUSE GAS INITIATIVE

ENFORCEMENT & PENALTIES (3X ALLOWANCE DEFICIT) FOR NON-COMPLIANCE

SOURCES "TRUE UP" AT END OF EACH 3-YEAR COMPLIANCE PERIOD

MOST STATES TO AUCTION 100% OF ALLOWANCES

EACH STATE ISSUES ONE "ALLOWANCE" FOR EACH TON IN BUDGET

2009 TO 2014 ANNUAL BUDGETS REMAIN SAME; 2.5% REDUCTION PER YEAR THRU 2018

INITIAL ANNUAL EMISSIONS CAP (OR ANNUAL ALLOWANCE BUDGET) = BASELINE

RGGI EMISSIONS BASELINE = "CURRENT EMISSIONS" FROM ALL RGGI SOURCES

RGGI SOURCES MUST MONITOR & REPORT EMISSIONS PER EPA REQUIREMENTS

SOURCES COVERED: POWER PLANTS GREATER THAN 25 MEGAWATTS

RGGI Offsets Decisions

- Offsets Allowed, but Limited Percentage
- Offsets "Valve" Allows more Offsets if per ton Costs are Higher than Projected
- Geography: Anywhere in the United States
- Offsets Standards-based
- 5 Initial Types:
 - Natural Gas, Propane, Heating Oil Efficiency;
 - Land to Forest;
 - Landfill Gas Capture & Combustion;
 - Methane Capture from Animal Operations; &
 - SF₆ Leak Prevention.
- Recognition of CDM Offset Credits



Other RGGI Decisions

- Early Reduction Credits Allowed
- New Source Entry without Barriers:
 Allowance Auction levels playing field
- RGGI expandable to other states
- RGGI can link to other trading programs, like WCI, or EU ETS post-2012.



Key RGGI Design Decisions

- Emissions Baselines based on Actual Monitored Emissions Data from Covered Sources
- Emissions Monitoring & Reporting per EPA
- Based on Proven Cap-and-Trade Model from EPA Acid Rain and Northeast Ozone Transport Commission (OTC) NOx Budget Program
- Offsets Kept as Simple as Possible



RGGI Remaining Issues

- Complete Implementation of Rules in States
- Establish Regional Organization to Coordinate Program
- Enter into Cooperative State Agreements on Offsets
- Expand Beyond Electricity Sector?
- Expand Geographically?
- Link with Western Climate Initiative?



For More Information

- RGGI Website: <u>www.rggi.org</u>
- RGGI Listserv: http://www.rggi.org/listserv.htm
- Franz Litz, Senior Associate Center for Climate Strategies <u>franzlitz@mac.com</u>

Franz T. Litz, Senior Associate Helping States and the Nation Tackle Climate Change



Regulating Oregon's CO₂ Emissions

Phil Carver
Oregon Dept. of Energy
July 23, 2007

Proposal for Oregon Electric Cap-and-Trade

Governor's Carbon Allocation Task Force (CATF) began in September 2005

• 10 page "median" proposal at:

http://www.oregon.gov/ENERGY/GBLWR M/CATF-Rpt-Ltrs.shtml

- Also cover letter to the Governor
- economic study, and
- comment letters from some CATF members

Legislation

- Legislation introduced as HB 3545.
 Did not pass.
- Annual emissions cap for electric retail providers over 15,000 tonnes/year
- Cap 2009 2011 = Base Period
- Cap 2020 = 10% below 1990 emissions
- Cap 2050 = 75% below 1990 emissions

Flexibility Mechanisms

- 5% to 10% of CO₂ allowances auctioned
- Three-year compliance periods
- Ability to "bank" allowances and carry them forward
- A low-hydro-year compliance respite
- Limited use of unbundled Renewable Energy Certificates (RECS) and offsets
- Special treatment for consumer-owned utilities (COUs) due to very low baseperiod emissions

COU Flexibility Provisions

AUCTION PROVISIONS:

- Single-price auction with right-of-firstrefusal for COUs, retail electric service suppliers (ESSs) and self-generators
- Base period emissions by COUs = about 4 percent of total electric emissions
- OPUC could find high bids by IOUs imprudent

COU Flexibility (cont.)

- 3 percent of allowances set-aside for significant new loads; allowances returned each year if not needed
- Unlimited use of greenhouse gas offsets against emissions from BPA mix

COU Flexibility (cont.)

- Unlimited use of unbundled renewable energy certificates (RECs) against emissions from:
 - Unspecified wholesale purchases in the BPA resource mix
 - Unspecified wholesale purchases by a COU

Alternative Compliance Payment

- Oregon PUC would decide if payment by IOUs was imprudent (i.e. shareholders pay)
- \$40 per metric ton of CO₂, indexed for inflation
- Funds go to CO₂ reduction measures
- ODOE would oversee COU's use funds

Economic Impacts of Proposal

- Compliance will likely increase power rates but lower power bills for most electricity users
- Due to significant levels of untapped cost-effective electricity conservation
- Uncertainties on 40-year cost of renewable power vs. natural gas or coalfired power
- Higher future load growth increases costs

Contact Information

Oregon Department of Energy

http://www.oregon.gov/ENERGY/

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The California Market Advisory Committee Recommendations

Franz Litz, Member California Market Advisory Committee

Helping States and the Nation Tackle Climate Change



Cal MAC Background

- Passage of "AB-32",
 The Global Warming Solutions Act of 2006
- Governor Schwarzenegger Directed Creation of MAC
- Cal EPA Secretary Selected 14-Member Committee
- Largely Outside, Independent Experts
- Mission: Provide Recommendations on Design of Market-based Program to Reduce GHG Emissions in CA



Lessons Learned from Existing Programs

- Create market scarcity by making sure the program does not distribute more allowances than are demanded.
- Allow for unrestricted banking of allowances
- Apply rigorous criteria for offset credits
- Ensure quality emissions data
- Maintain transparency of emissions data
- Create automatic penalties
- Consider early mandatory reporting
- Consider program adjustments after initial phase, but carefully plan program changes
- Coordinate with other programs to ensure linkages are possible.

Cal MAC Design Principles

- avoid localized effects or disproportionate impacts on low-income communities or communities already adversely affected by air pollution;
- reject approaches that might weaken existing environmental regulations;
- encourage practical, cost-effective emission reductions;
- minimize transaction costs associated with compliance; and
- provide a leadership example for other states and countries.

Cal MAC Recommendations

- Design Principles
- Phased Introduction of Cap-and-Trade Program, as Issues related to Data and Design are Resolved
- Allow Quality Offsets without Limit
- Auction All Allowances Over Time
- Reward Early Action
- No cost caps or other cost-containment mechanisms
- Provide for linkages with other programs, including RGGI and the EU ETS.



Cal MAC Phased Approach

- <u>First</u>: Cover large sources of emissions at the emissions source, and electric generators at "first sellers" to capture emissions from in-state and imported electricity.
- <u>Second</u>: Cover transport emissions "upstream" at the fuel source.
- <u>Third</u>: Cover emissions from commercial and residential buildings "upstream" at the fuel source.
- MAC recognized that not all emitters can be covered with a cap-and-trade program.



For More Information

- Cal MAC Final Report:
 - Press Release: http://www.climatechange.ca.gov/notices/news/2007-06-29 MAC FINAL RELEASE.PDF
 - Report: http://www.climatechange.ca.gov/documents/2007-06-29_MAC_FINAL_REPORT.PDF
- Presentation to the CA Air Resources Board, July 27th: Webcast: http://www.arb.ca.gov/

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Questions?

Helping States and the Nation Tackle Climate Change

